



**American
Forest & Paper
Association**

June 30, 2022

The Honorable Paul Tonko
Chairman
Subcommittee on Environment and
Climate Change
Committee on Energy and Commerce
U.S. House of Representatives

The Honorable David McKinley
Ranking Member
Subcommittee on Environment and
Climate Change
Committee on Energy and Commerce
U.S. House of Representatives

Dear Chairman Tonko and Ranking Member McKinley:

The American Forest & Paper Association (AF&PA) is pleased to submit for the record the following statement of support for the Recycling and Composting Accountability Act and the Recycling Infrastructure and Accessibility Act and comments on the Waste Title of the CLEAN Future Act and the Break Free From Plastic Pollution Act.

AF&PA serves to advance U.S. paper and wood products manufacturers through fact-based public policy and marketplace advocacy. The forest products industry is circular by nature. AF&PA member companies make essential products from renewable and recycle resources, generate renewable bioenergy and are committed to continuous improvement through the industry's sustainability initiative — [*Better Practices, Better Planet 2030: Sustainable Products for a Sustainable Future*](#). The forest products industry accounts for approximately four percent of the total U.S. manufacturing GDP, manufactures nearly \$300 billion in products annually and employs approximately 950,000 people. The industry meets a payroll of approximately \$60 billion annually and is among the top 10 manufacturing sector employers in 45 states.

Paper Recycling Is a Model That Works

We are a leader in recycling. The paper and paper-based packaging industry has a demonstrated, measurable record of success in making paper products more circular and sustainable through market-based approaches. A strong market for paper recycling is the result of our industry's voluntary investment in building the commercial paper recycling infrastructure and funding public-private partnerships that improve communities' capacity to recovery more mill-quality recyclable materials, as well as the commitment by millions of Americans who recycle at home, work and school every day.

- The paper industry recycles about 50 million tons of recovered paper every year — totaling more than 1 billion tons over the past 20 years.
- According to the EPA, more paper by weight is recovered for recycling than plastic, glass, steel, and aluminum combined.
- Our industry has an ownership stake in the recycling system and about 80 percent of paper mills use some amount of recycled fiber.
- Paper recycling rates have continuously grown over recent decades and remain consistently high, meeting or exceeding 63 percent since 2009.

- In 2021, 68 percent of paper was recycled and the recycling rate for old corrugated containers (OCC or cardboard boxes) was 91.4 percent.
- The paper industry has also planned or announced around \$5 billion in manufacturing infrastructure investments by the end of 2024 to continue the best use of recycled fiber in our products. These investments will help increase the amount of recovered paper used by U.S. paper and paperboard mills by approximately 8 million tons, which represents a 25 percent increase in consumption over 2020 levels.

Our industry prioritizes data collection to improve recycling rates and we have long invested in research into the current state of paper recycling and how we can improve. Earlier this year, AF&PA released the [2021 AF&PA Access to Recycling Study](#), showing that the vast majority of Americans, 94 percent, have access to community paper and paperboard recycling programs. In addition, in 2021, AF&PA released [The Design Guidance for Recyclability](#) to provide data for packaging designers and consumer brands to better understand how non-fiber elements, such as coatings and additives, impact the recyclability of paper-based packaging.

AF&PA Supports the Recycling and Composting Accountability Act and the Recycling Infrastructure and Accessibility Act

AF&PA is pleased to support H.R. 8059, the Recycling and Composting Accountability Act and we applaud the leadership of Representatives Neguse, Burchett, and Foster. The bill will help further increase and improve recycling and composting in the United States by helping the Environmental Protection Agency to improve measurement, data and reporting tools. AF&PA is also pleased to support H.R. 8183, the Recycling Infrastructure and Accessibility Act and we applaud the leadership of Representatives McKinley and Sherill. The bill will improve recycling accessibility in communities, including in underserved communities.

AF&PA Feedback on the CLEAN Future Act Waste Title (Title IX)

We appreciate the opportunity to comment on Subtitles B through D of the Waste Title of H.R. 1512, the CLEAN Future Act.

Subtitles B and C – Products Standards and Producer Responsibility and Zero-Waste Grants

AF&PA agrees with the important goal of reducing waste and reducing reliance on non-renewable and non-recyclable materials. However, products should not be lumped together regardless of recyclability or material type. A one-size-fits-all solution does not work for all commodities. Different commodities have different recycling and sustainability records, with distinct environmental and economic outcomes and varying degrees of investments and end market demand, and as such, should not be treated the same in legislation. Paper and paper-based packaging are part of the solution, providing a renewable, sustainable, and highly recycled packaging option for brand owners and consumers.

AF&PA believes that Extended Producer Responsibility (EPR) is not an effective solution for paper products. Consistently high recycling rates, a well-established infrastructure already in place to collect and process paper products, and the industry's ongoing efforts to increase voluntary recovery make mandates like EPR on paper and paper-based packaging unnecessary. For paper and paper-based packaging, EPR could prove to be harmful or even counterproductive. Government control over the flow of materials will disrupt dynamic, complex and efficient markets for

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recovered fiber, likely resulting in less fiber recovered for recycling and substantial additional administrative costs that will eventually be paid by consumers or taxpayers.

AF&PA supports the continued development and promotion of proven best practices that will leverage the existing investments in recovery. Widespread adoption of these best practices for recovery (including efficient collection systems, an optimized processing infrastructure, effective education and communications, and appropriate support mechanisms) will contribute to the recovery success sought. Where there is already a well-developed infrastructure for collecting paper and paper-based packaging in place, the United States should seek to improve consumer education to drive increased participation across the entire supply chain. At a minimum, these best practices should be implemented before any consideration is given to approaches such as EPR that, in fact, will disrupt the solid recovery foundation U.S. communities and their private sector partners already have built.

AF&PA opposes recycled-content mandates for paper products. Government should not arbitrarily mandate minimum post-consumer recycled content in products. The aim should be to increase paper recovery for recycling. Mandates are not needed to spur increased utilization of recovered fiber as recovered fiber markets are robust, paper recovery rates are high and global demand for recovered fiber is increasing. Our industry's utilization of recovered fiber at domestic mills has increased from 27 percent in 1990 to over 43 percent in 2021.

AF&PA opposes any distinction between pre- and post-consumer recycled content in government policies. Specific mandates for post-consumer recycled content for paper-based products create the misleading perception that certain types of recovered fiber are better than others. Current third-party certification standards Forest Stewardship Council and Sustainable Forestry Initiative treat pre- and post-consumer recycled content equally, supporting the fact that all paper fiber that can be recovered should be recycled into new paper products.

Subtitle D – Education and Outreach

AF&PA supports government investment in consumer education to improve recycling. Much of the text of this subtitle is from the Recycling Enhancements to Collection and Yield Through Consumer Learning and Education (RECYCLE) Act. AF&PA supported this bill and was pleased it was included in the bipartisan infrastructure law signed into law.

AF&PA Feedback on the Break Free From Plastic Pollution Act

AF&PA opposes the inclusion of paper products in H.R. 2238, the Break Free From Plastic Pollution Act. As stated above, we agree with the important goals of reducing waste and reducing reliance on non-renewable and non-recyclable materials but do not believe that Extended Producer Responsibility (EPR) is an effective solution for paper products.

Sincerely,



Laura Pickard
Director, Government Affairs and International Trade